

MN - 251
(Revised 10/00)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Von Ro Corporation,

Debtor.

Chapter 7

BKY 13-34910 – GFK

APPLICATION FOR APPROVAL OF EMPLOYMENT OF
AN AGENT TO SELL, RECOMMENDATION AND ORDER

1. Applicant is the trustee in this case.
2. Applicant applies for approval of the employment of Keith Franklin doing business as Franklin Outdoor Advertising, 20092 Edison Circle East, Clearwater, MN 55320, (320) 558-3000, as an agent to sell the following property:
 1. 1985 Komfort 5th Wheel VIN 1K73KFN26F1002460 (the “Komfort”)
 2. 2013 Enterra Cruiser RV VIN4RXTE3128D2200339 (the “Enterra”)
 3. 2004 Dutchman Classic VIN47CTD4T284G51456 (the “Dutchman”)
3. An Order Authorizing the Sale of the above property was entered by the Court dated September 1, 2015 [Doc. No. 70].
4. The terms and conditions of compensation and reimbursement of expenses are as follows: 10% commission of the sales price, plus \$200.00 per vehicle for hauling to Clearwater, MN, not to exceed \$600; and \$175.00 per month for advertising, not to exceed \$350.00. Upon completion of the sale and the submitting of his invoice, the agent will be paid his commission and expenses that will be deducted from the proceeds of the sale, with the net sale proceeds being delivered to the Trustee. The Trustee has verified the appropriate bonding and insurance coverage. The Trustee and the agent have agreed that the deadline for the turnover auction sales proceeds will be no later than within 30 days of the sale. The agent to sell will take possession of the items to be sold and follow the professional’s usual and customary methods of securing the property.
5. Said professional has disclosed to the undersigned that he has the following connections with the debtors, creditors, any other party-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee as follows: Applicant has been represented by the law firm of Lapp, Libra, Thomson, Stoebner & Pusch in matters unrelated to this bankruptcy case.

WHEREFORE, Applicant requests that the Bankruptcy Court approve such employment by the trustee.

Dated: February 24, 2016

/e/ John R. Stoebner
John R. Stoebner, Trustee
120 South Sixth Street, Suite 2500
Minneapolis, MN 55402
(612) 338-5815

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VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)

I, Keith Franklin, the professional named in the application for employment on behalf of the above named bankruptcy estate, declare under penalty of perjury the following:

1. I do not hold or represent any interest adverse to the estate and am disinterested as required by 11 U.S.C. § 327.
2. I do not have any connections to the debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the offices of the United States Trustee, except for the following: Applicant has been represented by the law firm of Lapp, Libra, Thomson, Stoeber & Pusch in matters unrelated to this bankruptcy case.

3.

Dated: February 22, 2016



Keith Franklin doing business as
Franklin Outdoor Advertising
20092 Edison Circle East
Clearwater, MN 55320
(320) 558-5000
kfranklin@franklinoutdoor.com

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UNSWORN CERTIFICATE OF SERVICE

I, Nancy I. Spooner, declare under penalty of perjury that on February 24, 2016, I e-mailed copies of the attached **Application for Approval of Employment of an Agent to Sell, Verified Statement and proposed Order** to each entity named below at the address stated below for each entity:

USTPRegion12.MN.ECF@usdoj.gov

U.S. Trustee
1015 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Executed on: February 24, 2016

/e/ Nancy I. Spooner
Nancy I. Spooner, Paralegal
Lapp, Libra, Thomson, Stoeber &
Pusch, Chartered
120 South Sixth Street, Suite 2500
Minneapolis, MN 55402
612/338-5815

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ORDER

The trustee's application to approve the employment of Franklin Outdoor Advertising as the trustee's agent to sell came before the court.

Based on the application, the recommendation of the United States Trustee and 11 U.S.C. § 327,

IT IS ORDERED: The employment is approved.

Dated:

Gregory F. Kishel
Chief United States Bankruptcy Judge